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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**JOE BOB SCROGGINS**

**Debtor**

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§  
§  
§  
§

**CASE NO. 22-41027-MXM-13**

**CHAPTER 13**

**DEBTOR'S RESPONSE TO TRUSTEE'S NOTICE OF INTENT TO DISMISS  
DEBTOR'S CHAPTER 13 CASE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **JOE BOB SCROGGINS**, Debtor in the above-styled and numbered cause and in response to the Standing Chapter 13 Trustee's Notice of Intent to Dismiss Chapter 13 Case would respectfully show the Court, as follows:

1. The Debtor admits that he is currently delinquent in his Trustee payments. The Debtor respectfully requests the court to not dismiss his case pursuant to the deadline to pay per the Notice of Intent to Dismiss.
2. Debtor would request that the Dismissal be delayed until the hearing date to allow debtor time to bring the default current.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that Trustee's Notice of Intent to Dismiss be denied and for such other and further relief in law and equity as the Court deems just.

Dated: October 31, 2022

Respectfully Submitted,

By: /s/ Eric A Maskell  
Christopher M. Lee  
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ATTORNEY FOR DEBTOR(S)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 31, 2022, a true and correct copy of the foregoing Response to Trustee's Notice of Intent to Dismiss Chapter 13 Case was served on the following parties in interest by first class mail:

**STANDING CHAPTER 13 TRUSTEE**

Tim Truman  
6851 N.E. Loop 820, Suite 300  
North Richland Hills, TX 76180

**U.S. TRUSTEE**

United States Trustee  
1100 Commerce, Room 976  
Dallas, TX 75242

**DEBTOR:**

Joe Bob Scroggins  
1828 Lariat Dr  
Justin, TX 76247

/s/ Eric A Maskell  
Eric A Maskell  
State Bar No. 24041409  
ATTORNEY FOR DEBTOR